

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

MATHEW KNOWLES AND MUSIC
WORLD ENTERTAINMENT, §
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§
CIVIL ACTION NO.
Plaintiffs,
v.
THE SUN, *a publication of the NI*
Group Ltd., §
§
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§
§
§
JURY TRIAL REQUESTED
Defendant.

ORIGINAL COMPLAINT

Mathew Knowles and Music World Entertainment complain of The Sun, a publication of the NI Group Ltd. ("The Sun"), as follows:

I. NATURE OF THE CASE

1. This is a defamation action against the Rupert Murdoch tabloid, The Sun, for knowingly and maliciously misrepresenting Mathew Knowles' relationship with his daughter, Beyoncé, and with his granddaughter.

2. In brief, The Sun induced Knowles to be give an interview on the promise that The Sun's story would be balanced, truthful, and limited to particular topics. In keeping with the parties' agreement, Knowles gave an extensive (and recorded) interview about the prospects for Knowles' world-wide music business and his family.

3. When the interview revealed a story untainted with scandal or intrigue, however, Murdoch's Sun simply supplied its own, fabricating a story that would sell more

papers and advertising than would the truth. The Sun's story was not based on the interview. It was made up. With no consideration for the results of its actions, The Sun published malicious and false statements that The Sun knew to be false. Other facts were simply fabricated without regard for the truth.

II. JURISDICTION AND VENUE

4. This Court has diversity jurisdiction because the controversy is between two Texas based plaintiffs and an English corporation, and the amount in controversy exceeds \$75,000. 28 U.S.C. § 1332(a)(2).

5. Venue is proper in the Southern District of Texas because a substantial part of the events and transactions giving rise to the controversy and the harms complained of occurred in the Southern District of Texas. 28 U.S.C. § 1391.

III. THE PARTIES

6. Mathew Knowles is a Houston resident.

7. World Music Entertainment is a Texas limited liability company located at 1505 Hadley Street, Houston, Texas 77002.

8. The Sun is published by NI Group Ltd., which can be served with process at NI Group Ltd., 3 Thomas More Square, London E98 1XY, United Kingdom.

IV. FACTUAL BACKGROUND

A. Mathew Knowles

9. Mathew Knowles is a true American success story. A successful businessman, he recognized the unworldly talent of his eldest daughter, Beyoncé, and quit his job. Beginning a new career, he returned to school, formed a new business, and helped transform a group of promising young girls into international sensations. Later, Knowles helped Beyoncé become

one of the biggest solo stars in the world. At the same time, he created a world class entertainment business, Music World International.

10. Then came a time of change in the Knowles' family. Beyoncé, now an adult and married to Jay-Z, an international star and music producer, had reached the stage in her life where she needed to move beyond having her business run by her father. It was time for Beyoncé to manage her own career.

11. Given the personalities, this normal evolution of the relationship between a father and an adult, married daughter was a highly public event. Beyoncé explained the process in interviews with Oprah Winfrey in February of this year and in a self-produced biography entitled, "Life is But a Dream," which aired on HBO in the same month. In the Oprah interview, Beyoncé explained, "it's part of life and it's a part of growth and I had to tell myself at some point I have to be the adult that my father has raised me to be." She also explained that the decision was difficult precisely because she loved her father, because he had "done such a fantastic job," and because she wanted to keep that family relationship pure. Beyoncé's relationship with her father was also a focus of her HBO documentary, which includes footage of Knowles holding his newborn granddaughter.

12. It was in this context that a reporter for The Sun requested an interview with Mathew Knowles.

B. The Interview Request and Contract

13. In February of this year, Knowles was contacted by Georgina Dickinson, who described herself as "a reporter working for The Sun, a British newspaper which is one of the biggest selling publications in the world."

14. Suspicious of the reporter's intent, Knowles and his representatives had specific communications about the scope and nature of the interview.

15. Knowles was willing to discuss how his business, Music World International, was going to move forward, but was reluctant to discuss his personal life, particularly his

family. For example, on March 18, 2013, Knowles' press agent reiterated that "Mr. Knowles will not discuss personal family topics, only his career and the career of his artists, and music or business topics."

16. Negotiations commenced about the scope of the interview. The reporter promised that she would "paint a well-rounded picture of Mr. Knowles, both as a loving family man and force to be reckoned with in the music world." The reporter noted that such a picture would include some personal topics. Specifically, the reporter claimed she wanted to discuss some of the same topics discussed in Beyoncé's Oprah and HBO interviews, demonstrating that The Sun's reporter had seen both shows.

17. Ultimately, The Sun and Knowles reached an agreement on the scope of the interview. The Sun even offered to pay Knowles for the interview and for his promise to forego future interviews with any other United Kingdom publications. The promised payment, however, was never made.

C. The Interview

18. On its face, the interview went according to the parties' agreement.

19. Attempting to insure compliance with the parties' agreement and with The Sun's consent, Knowles recorded the interview.

D. The Story

20. Almost immediately after the interview, Knowles was shocked to see a story on The Sun's website claiming that its next Sunday print issue would include a story about Knowles that bore no relation to the interview he had just given.

21. The Sun story was sensational, but also defamatory and untrue.

22. In total, it read as follows:

I always did my best for Beyonce ... fans can decide if she's better off now with Jay-Z

- Former manager talks about family rift for first time
- Mathew Knowles has reportedly not yet met Blue Ivy



Split ... Mathew says Beyonce has cut him out of her life

Exclusive

By GEORGINA DICKINSON, In Houston

Published: 24th March 2013

BEYONCE'S dad has talked for the first time about the bitter rift with his famous daughter – admitting he is devastated at being pushed out of her life.

In an exclusive interview with The Sun, Mathew Knowles also hits back at claims he mismanaged the singer's finances when he was in charge of her career.

Although he insists the decision to go their separate ways was mutual, Mathew, 61, is hurt that Beyonce has cut him out of her life.



Happier times ... Mathew Knowles with daughter Beyonce before rift
Dave Hogan

It is believed he is yet to meet his 14-month-old granddaughter Blue Ivy, Beyoncé's child with rapper husband Jay-Z.

Mathew says: "I've never revealed this much in an interview before.

"Normally I hate to talk about anything personal, but it would be a lie if I did not say it has been difficult.

"It was hard for me to let her go — it was hard for both of us to let each other go. And let's be clear on that. She didn't let me go, we both let each other go. That's a big difference."



Family business ... Jay-Z now manages his wife Beyonce's career

Speaking from his office in Houston, Texas, he adds: "This was not a normal ending of a business agreement. This was a dad and a daughter and it was incredibly painful and it had some difficulties.

"But I try to always have a positive mind about things and you got to do it the right way."



That's my Bey-by ... Beyonce with daughter Blue Ivy

E. Known Falsity, Malice, and an Apology

23. The Sun placed sensationalism over the truth, and it did so knowingly.

24. In fact, the Sun's reporter admitted the falsity. After Knowles viewed the article, he immediately contacted Dickinson. She responded that she could "only apologize that someone in London, not me," changed the story. Claiming that the London editors were "wary of saying [Knowles] had definitely met" his granddaughter, they simply "changed that part of my copy."

25. In the same email, Dickinson provided Knowles with the story she had submitted to The Sun.

26. The contrast between the story submitted by Dickinson and that published by The Sun is stark.

27. For example, Dickinson's unpublished story discusses how Knowles and his daughter "severed professional ties," but that "thankfully despite their professional split he remains close to his family and loves nothing more than being a granddad to his daughter's newborn baby girl Blue Ivy." The Sun changes this to a "bitter rift with his famous daughter—admitting he is devastated at being pushed out of her life."

28. Dickinson's story quotes Knowles: "I have sung the same song to Blue Ivy that I used to sing to Solange and Beyoncé when they were still in Tina's belly"—a Smoky Robinson tune. The Sun turned this happy moment into the claim that Knowles "has reportedly not yet met Blue Ivy."

29. The Sun's story also states that, in the exclusive interview, Knowles "hits back at claims he mismanaged the singer's finances when he was in charge of her career," but Dickinson's story contains no such claims, which were not discussed in the taped interview.

30. Apparently satisfied that it had sold enough advertisement without having to publish the truth, following Knowles' objection to the falsities in The Sun's publication, The Sun did not publish the actual interview in its Sunday edition as it had promised.

31. The internet story, however, remains online and its false claims have been repeated on numerous other sites.

32. The Sun knew its published story was false or alternatively acted with reckless disregard for the truth in publishing its story. For example, the last photo in The Sun's story, of Beyoncé holding her daughter, was extracted from the HBO documentary, "Life is But a Dream." That same documentary had the following image of Knowles holding the granddaughter The Sun claims he has never met:



33. The Sun's reporter, Dickinson, clearly knew the truth. She had seen the documentary before interviewing Knowles at his office, where Knowles, like any proud grandfather, had a photo of himself with Blue Ivy prominently displayed during the interview.

34. The Sun knowingly defamed Knowles to sell more advertisement. It is responsible for the consequences of that act.

V. CLAIMS FOR RELIEF

35. Based on the foregoing facts, incorporated by reference, Knowles asserts the following claims for relief.

A. First Claim for Relief—Defamation

36. The Star's publication was defamatory.
37. The defamatory statements were made with malice and specific intent to defame.
38. Knowles is entitled to actual and punitive damages.

B. Second Claim for Relief—Breach of Contract

39. The interview was held pursuant to an agreement made pursuant to the laws of the State of Texas.

40. The Sun breached its contract.
41. Knowles is entitled to actual damages, including special damages, and attorney's fees pursuant to Tex. Civ. Prac. & Rem. Code § 38.001. Presentment was made more than 30 days before this action was filed.

VI. JURY TRIAL DEMAND

42. Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Knowles demands a trial by jury.

VII. PRAYER FOR RELIEF

Knowles respectfully prays that this Court award it all relief to which it is entitled under law or equity.

Dated: June 25, 2013

Respectfully submitted,

By: /s/ Mark Maney

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